

WIC **WIC POLICY AND PROCEDURE MANUAL**

Michigan Department of Community Health

Chapter/Section: 1.09

Effective Date: 2/1/07

Issue Date: 1/16/07

1. GENERAL ADMINISTRATION

1.09 Management Evaluation/Accreditation/Quality Assurance

FINAL

PURPOSE: The purpose of this policy is to outline the policies and procedures necessary to perform the WIC Management Evaluation, WIC component of the Michigan Local Public Health Accreditation and annual program quality evaluation as required by USDA (Federal Regulations 246.19).

DEFINITIONS:

Accreditation (AC): WIC Management Evaluation (designated Section XIII for Cycle 3) performed as a component of the Michigan Local Public Health Accreditation Program, which occurs every three years, for WIC Programs in local health departments. An Accreditation takes the place of a WIC Management Evaluation (ACME) when it is performed according to schedule. Accreditation will accept WIC ME's performed within the previous fiscal period to allow for USDA requirement for biennial reviews.

ACME: Acronym used to describe the combined WIC Management Evaluation and Accreditation process.

Management Evaluation (ME): Review of local agency WIC operations including; management, certification, nutrition education, participant services, civil rights compliance, accountability, financial management and food delivery systems, in order to assure that quality services are being provided and Minimum Program Requirements and contractual expectations are met.

MPR: Acronym for Minimum Program Requirements-which are the specified WIC duties referred to in Federal Regulation or MDCH/WIC Policy.

Primary Clinic: A WIC clinic site that provides comprehensive WIC services on a regular basis (i.e. several days a week).

Secondary Clinic: A periodic (i.e., weekly, monthly or bi-monthly) clinic site that is staffed from the primary Clinic.

Subcontractor: An entity who is contracted with the WIC local agency to provide WIC services and who receives funding and oversight from the WIC Local Agency.

A. POLICY

- 1. MDCH WIC Division shall conduct monitoring reviews of each local agency at least every two years. This may be either a WIC-only Management Evaluation or serve as part of the agency-wide Accreditation review. Recommended timeframes for the process are included in the Guidance Section B of this policy.**
- 2. Monitoring shall encompass but not be limited to:**

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- a. Program administration
 - b. Certification
 - c. Nutrition education
 - d. Civil rights, referrals and outreach
 - e. Coupon accountability, financial management systems and food benefit delivery systems
 - f. Project Fresh, if applicable
 - g. Minimum Program Requirements (MPR) as stated in local agency agreements
3. One clinic at each local agency or 20% of primary clinics or subcontracted clinics shall be reviewed, whichever is greater. Additional on-site reviews may be conducted, as necessary.
4. The local agency will receive a report listing all established criterion (MPR's) and indicators as met or not met.
5. Local agencies who are cited with criteria that were not met shall submit a Corrective Plan of Action (CPA) within stated timeframes to the MDCH/WIC Division or Accreditation Program for approval.
6. The Corrective Plan of Action will be responded to by MDCH/WIC with a review or approval letter, stating any needed corrections or modifications to the plan, as agreed upon with the local agency.
7. MDCH WIC Division Local Agency Consultant will monitor progress and give final approval for full local agency implementation of approved Corrective Plan of Action.
8. The Corrective Plan of Action must be completed and fully implemented within 1 year of the ACME exit conference date to be eligible for Accreditation, and in good standing with MDCH/WIC Division. MDCH/WIC will issue a written letter of implementation when the agency has fully implemented the plan and implementation has been verified by the WIC Consultant.
9. Agencies that do not complete the Corrective Plan of Action within the stated timeframes shall be subject to the following actions:

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- a. Intensive MDCH/WIC monitoring and consultation of program activities (including annual Management Evaluations) until compliance is met.
- b. Financial penalties, as determined through Office of Audit, for inappropriate certification (fraud or abuse, see Policy 10.03) or fraudulent benefit issuance, coupon accountability or recordkeeping.
- c. Withdrawal of agreements to provide WIC services in cases where all efforts to meet requirements fail.

10. Local Agency Quality Assurance:

- a. Local WIC agencies shall perform annual evaluations containing the same components as detailed in A2 a-g.
- b. WIC Local Agencies who sub-contract WIC services shall provide monitoring and quality assurance oversight to the sub-contractor on at least an annual basis to ensure that they meet the program guidelines and comply with any comprehensive plans of action approved by MDCH/WIC for the agency.
- c. Evaluation tools may be MDCH/WIC forms or locally developed monitoring forms with similar scope.
- d. Documentation of monitoring events and training or feedback provided to sub-contract staff shall be on file for examination during the agency Management Evaluation or Accreditation site visit.

B. Guidance-Management Evaluation/Accreditation Timelines:

- a. MDCH/WIC ACME Process
 - i. The WIC state agency determines the roster for Management Evaluations/Accreditation visits by January 1 of each fiscal period.
 - ii. Local agency consultants schedule the dates for the ACME site visits by March 1 of each fiscal period
 - iii. Local agencies are notified of the dates and times of the planned visits by letter by March 15 (or within 30 days of the review, if it occurs earlier in the fiscal year). Included with the notification are the materials that will be used for the Evaluation, covering all aspects of WIC services.
 - iv. Review, including entrance and exit conference with WIC Coordinator, Health Officer or designee and other WIC or agency staff, as desired.
 - v. Letter/report to Agency or MPHI (ME-45 days or Accreditation-10

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- days from exit conference)
- vi. Approval/review of Comprehensive Plan of Action (CPA) within 15 days of receipt.
- vii. Monitoring, training and consultation during implementation phase until CPA fully implemented.
- viii. Final approval of fully implemented CPA to Agency (& MPH) within 1 year of ACME exit conference.

b. Local Agency ACME Process

- i. Scheduling ACME visit with MDCH/WIC Consultant
- ii. Local agency pre-visit review of evaluation materials provided with the notification letter.
- iii. On-site visit by MDCH/WIC staff/contractors to observe local agency operations and review local agency records and participant charts. Interviews with participants and staff are also performed during the visit.
 - 1. The visit will be scheduled with an entrance and exit conference with local agency WIC staff and managers and the reviewer.
- iv. Letter/report from MDCH/WIC or Accreditation committee detailing findings and response required.
- v. Local agency Comprehensive Plan of Action (CPA) to resolve each finding “not met” by the agency to MDCH/WIC within stated timeframes.
- vi. Approval of CPA (with revisions if necessary) by MDCH/WIC
- vii. Implementation of CPA, with any assistance required from MDCH/WIC staff.
- viii. Notification to MDCH/WIC that CPA has been fully implemented for at least 90 days.
 - 1. Review of CPA evaluation and or site visit with chart review, observation or other activities to determine status of CPA.
 - 2. Response from MDCH/WIC detailing any outstanding issues or completion of CPA until CPA is completed and agency has received final approval of CPA/Accreditation.

References:

Federal Regulations 246.19

Management Evaluation Tools (MPR document and ME chapters)

Michigan Local Public Health Accreditation Program Guidance

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Management Evaluation/Accreditation Sample Timetable

Local Agency 75 is due for Management Evaluation in FY 2006/2007 and Accreditation in October of 2007 (FY 2007/08).

MDCH/WIC would schedule the agency by March 1, 2007 and provide them with a confirmation notice and Evaluation materials. The MDCH/WIC Consultant (or contractor) would perform the WIC Management Evaluation (Section XIII) during week of May 1 - which would be reported to MPHI as the Accreditation. The agency would receive their report from MDCH/WIC within 45 days of the exit conference (by June 20th).

The local agency submits the Corrective Plan of Action for each citation not met within 30 days of the date of the report. MDCH/WIC approves the Corrective Plan of Action within 10 days of receipt of the Plan.

The local agency fully implements the plan and notifies MDCH/WIC after 90 days.

MDCH/WIC consultant reviews progress on the plan by material review, site visit review or with further direction/consultation if the corrective plan of action is not yielding desired results.

Sample timeframes for WIC Management Evaluation/Accreditation Process

Local Agency	Week of Review	Report due from MDCH/WIC	Plan Due to MDCH/WIC or MPHI	Plan Approval Deadline	Implementation Period + 90 days	WIC Review of Plan	Final date for remediation or plan approval
75-Lower MI DHD	5/1-5/5	6/20	7/20	7/30	Implementation date + 90 days	Within 30 days	By 5/5 of the following year